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Certificate of Notice Page 1 of 4 States Bankruptčy Eastern District of Pennsylvania

In re: Daniel J. Lytwyn Angela M. Lytwyn Debtors Case No. 17-10728-ref Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-4 User: Keith Page 1 of 1 Date Rcvd: Dec 29, 2017

Form ID: pdf900 Total Noticed: 2

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Dec 31, 2017.

db/idb +Daniel J. Lytwyn, Angela M. Lytwyn, 1275 Vera Drive. Easton, PA 18040-5828

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. +E-mail/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com Dec 30 2017 00:44:40 Orion (VERIZON),

c/o PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021 TOTAL: 1

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Dec 31, 2017 Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on December 29, 2017 at the address(es) listed below:

FREDERICK L. REIGLE on behalf of Trustee FREDERICK L. REIGLE ecfmail@fredreiglech13.com,

ecf_frpa@trustee13.com

FREDERICK L. REIGLE ecfmail@fredreiglech13.com, ecf_frpa@trustee13.com
LISA MARIE CIOTTI on behalf of Trustee FREDERICK L. REIGLE ecfmail@fredreiglech13.com, ecf_frpa@trustee13.com

MATTEO SAMUEL WEINER on behalf of Creditor Lakeview Loan Servicing, LLC bkgroup@kmllawgroup.com

MATTEO SAMUEL WEINER on behalf of Creditor M&T Bank bkgroup@kmllawgroup.com
REBECCA ANN SOLARZ on behalf of Creditor Lakeview Loan Servicing, LLC bkgroup@kmllawgroup.com
STEPHEN MCCOY OTTO on behalf of Debtor Daniel J. Lytwyn steve@sottolaw.com, info@sottolaw.com,

no_reply@ecf.inforuptcy.com STEPHEN MCCOY OTTO on behalf of Joint Debtor Angela M. Lytwyn steve@sottolaw.com,

info@sottolaw.com,no_reply@ecf.inforuptcy.com

United States Trustee USTPRegion03.PH.ECF@usdoj.gov

TOTAL: 9

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Daniel J. Lytwyn Angela M. Lytwyn	<u>Debtors</u>	CHAPTER 13
Lakeview Loan Servicing, LL vs.	C <u>Movant</u>	NO. 17-10728 REF
Daniel J. Lytwyn Angela M. Lytwyn	<u>Debtors</u>	11 U.S.C. Section 362
Frederick L. Reigle Esq.	Trustee	

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtors' residence is \$11,511.25 which breaks down as follows;

Post-Petition Payments:

August 1, 2017 to November 1, 2017 at \$2,096.05/month

December 1, 2017 at \$2,128.18/month

Suspense Balance:

(\$1,363.14)

Fees & Costs Relating to Motion:

\$1,031.00

Total Post-Petition Arrears

\$10,180.24

- 2. The Debtors shall cure said arrearages in the following manner:
- a). Within seven (7) days of the filing of this Stipulation, Debtors shall file an Amended Chapter 13 Plan to include the post-petition arrears of \$10,180.24.
- b). Movant shall file an Amended or Supplemental Proof of Claim to include the post-petition arrears of \$10,180.24 along with the pre-petition arrears;
- c). The new 410A form for a Proof of Claim shall not be required for this Amended or Supplemental Proof of Claim.
- 3. Beginning with the payment due January 1, 2018 and continuing thereafter,

 Debtors shall pay to Movant the present regular monthly mortgage payment of \$\$2,128.18 (or as adjusted pursuant to the terms of the mortgage) on or before the first (1st) day of each month (with late charges being assessed after the 15th of the month).

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> 4. Should Debtors provide sufficient proof of payments made, but not credited (front

& back copies of cancelled checks and/or money orders), Movant shall adjust the account

accordingly.

5. In the event the payments under Section 3 above are not tendered pursuant to the

terms of this stipulation, Movant shall notify Debtors and Debtors' attorney of the default in writing

and the Debtors may cure said default within FIFTEEN (15) days of the date of said notice. If

Debtors should fail to cure the default within fifteen (15) days, Movant may file a Certification of

Default with the Court and the Court shall enter an Order granting Movant immediate relief from the

automatic stay and waiving the stay provided by Bankruptcy Rule 4001(a)(3).

6. If the case is converted to Chapter 7, Movant shall file a Certification of Default

with the Court and the Court shall enter an order granting Movant relief from the automatic stay.

7. If the instant bankruptcy is terminated by either dismissal or discharge, this

agreement shall be null and void, and is not binding upon the parties.

8. The provisions of this stipulation do not constitute a waiver by Movant of its right to

seek reimbursement of any amounts not included in this stipulation, including fees and costs, due

under the terms of the mortgage and applicable law.

9. The parties agree that a facsimile signature shall be considered an original signature.

December 21, 2017 Date:

By: /s/ Rebecca A. Solarz, Esquire

Rebecca A. Solarz, Esquire Attorney for Movant/Creditor

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadel**c**hia. PA 19106-1532

627-7734

Date:

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Approved by the Court this ____ day of ______, 2017. However, the court retains discretion regarding entry of any further order.

Date: December 29, 2017

RAME ALL

Bankruptcy Judge Richard E. Fehling